

Exhibit A

EXHIBIT A – PLAINTIFF R2 SOLUTIONS LLC’S PROPOSED CONSTRUCTIONS AND SUPPORT**A. U.S. Pat. No. 8,190,610**

Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
“a plurality of mapping functions that are each user-configurable”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<u>Intrinsic</u> : ’610 patent at 1:17-27; 2:56-61; 4:58-62; FIG 2 (and related text); FIG. 4 (and related text)
“the first data group is mapped differently than the data of the second data group”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<u>Intrinsic</u> : ’610 patent at 3:48-57; FIG. 4 (and related text); 07/06/2011 Amendment at 14-16; 03/09/2010 Amendment at 13-15
“data set”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<u>Intrinsic</u> : ’610 patent at 3:58-62; 8:47-52; 8:31-33; FIG. 4 (and related text) <u>Extrinsic</u> : “data set” – The New Penguin Dictionary of Computing, Penguin Books 2001, p. 122.
“data group”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<u>Intrinsic</u> : ’610 patent at 3:58-62; 3:65-4:1; FIG. 4 (and related text)
“data partition”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<u>Intrinsic</u> : ’610 patent at 2:31-35; 3:1-3; 4:14-18; 4:60-5:4; 8:30-34; FIG. 1 (and related text); FIG. 2 (and related text); FIG. 3 (and related text); FIG. 4 (and related text); 11/09/2011 Amendment at 14-17

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Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
“including processing the intermediate data for each data group in a manner that is defined to correspond to that data group, so as to result in a merging of the corresponding different intermediate data based on the key in common”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<u>Intrinsic</u> : ’610 patent at 3:50-57; 2:49-51; 4:56-57; 1:17-27; 1:37-40; 2:5-8; 2:36-51; 4:56-58; 8:52-55; FIG. 5 (and related text)
“at least one output data group is a plurality of output data groups”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<u>Intrinsic</u> : ’610 patent at 3:58-4; 4:23-35; 3:48-57; FIG. 1 (and related text); FIG. 2 (and related text); FIG. 4 (and related text); FIG. 5 (and related text)

B. U.S. Pat. No. 8,341,157

Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
“determining, at least the one computing device, a plurality of intents from the at least one keyword, each of the plurality of intents indicates a type of information regarding the query keyword that is likely to be desired by a user submitting the query”	“determining, using the at least one computing device, a plurality of intents from the at least one keyword, wherein each of the plurality of intents indicates a type of information regarding the query keyword that is likely to be desired by a user submitting the query”	<u>Intrinsic</u> : ’157 patent at 9:42-61; 1:37-40; 3:48-57; FIG. 3 (and related text)

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Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
“wherein the at least one intent comprises an unclassified intent”	“wherein the at least one intent is not mapped from one or more keywords to a goal the user pursues in a search query”	<u>Intrinsic</u> : ’157 patent at 9:42-44; 5:6-9; 4:64-5:9.
“the query is classified by linguistic analysis of the at least one query keyword”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<u>Intrinsic</u> : ’157 patent at 11:56-57; 4:28-30; 9:36-47.
“intents”	“goals that users pursue in a search query”	<u>Intrinsic</u> : ’157 patent at 9:44-47; 3:46-67

C. U.S. Pat. No. 7,698,329

Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
“said data includes an abstract describing each document of said plurality of documents”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<u>Intrinsic</u> : ’329 patent at 4:22-25; 4:54-60
“each document of said certain documents containing at least one section that is not used by said search engine for recall and one or more sections that are used by said search engine for recall”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<u>Intrinsic</u> : ’329 patent at FIG. 1 (and related text) FIG. 3 (and related text); 2:31-33; 3:7-4:60; 01/04/2010 Amendment at 6-9; 07/10/2009 Amendment at 6-10

EXHIBIT A – PLAINTIFF R2 SOLUTIONS LLC’S PROPOSED CONSTRUCTIONS AND SUPPORT

Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
“wherein ranking a plurality of documents includes ranking said plurality of documents based, at least in part, on the at least one section of said certain documents not used by said search engine to recall documents”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<u>Intrinsic</u> : ’329 patent at 1:60-2:17; 3:1-31; 4:1-16; 01/04/2010 Amendment at 6-9; 07/10/2009 Amendment at 6-10
“for each respective abstract of each document of said certain documents, said abstract excludes terms from the respective at least one section not used by said search engine to recall said each document”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<u>Intrinsic</u> : ’329 patent at 4:54-60
“document(s)”	“any unit of information that may be indexed by search engine indexes”	<u>Intrinsic</u> : ’329 patent at 1:33-36

D. U.S. Patent No. 8,209,317

Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
“query reconstruction server ... operative to receive a partial query submitted at a remote user client system ...	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<u>Intrinsic</u> : ’317 patent at FIG. 1 (and related text); FIG. 2 (and related text); FIG. 3 (and related text); FIG. 4 (and related text); FIG. 5 (and related text); FIG. 6 (and related text); FIG. 7 (and related text);

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Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
and ... determine a full query”		1:60-65; 3:27-40; 3:60-4:5; 2:6-13; 2:24-25
“partial query”	“any abbreviated or incomplete search query such that the submitted query is not fully representative of the entire search query desired by the user.”	<u>Intrinsic</u> : ’317 patent at 3:11-15
“...not fully representative of an entire search query desired by the user”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<u>Intrinsic</u> : ’317 patent at 3:9-26; FIG. 2 (and related text); FIG. 6 (and related text); FIG. 7 (and related text)
“...better representative of an entire search query desired by the user”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<u>Intrinsic</u> : ’317 patent at 3:9-26; FIG. 2 (and related text); FIG. 6 (and related text); FIG. 7 (and related text)

E. U.S. Patent No. 9,928,279

Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
“streaming appliance computing device.”	“a device capable of streaming a media file”	<u>Intrinsic</u> : ’279 patent at FIG. 8 (and related text); FIG. 9 (and related text); 5:36-42; 12:23-29; 26:57-62; 01/03/2017 Amendment at 2-15
“single-action user input”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<u>Intrinsic</u> : ’279 patent at FIG. 4 (and related text); FIG. 5 (and related text); FIG. 8 (and related text); FIG. 9 (and related text); 25:42-56; 26:52-56; 27:11-21; U.S. Pat. App. Ser. No. 11/250,358

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Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
		(parent application of ’610 patent) file history, 02/19/2010 Amendment with RCE at 9-15

F. U.S. Patent No. 7,370,011

Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
“a link from a portal”	“a link from a service that stands between the user and another service to perform an added value”	<p><u>Intrinsic</u>: ’011 patent at 4:29-32</p> <p><u>Extrinsic</u>: “link” – The New Penguin Dictionary of Computing, Penguin Books 2001, p. 279.</p>
“each link from the portal”	“each link from the service that stands between the user and another service to perform an added value”	<p><u>Intrinsic</u>: ’011 patent at 4:29-32</p> <p><u>Extrinsic</u>: “each” - Webster’s Encyclopedic Unabridged Dictionary of the English Language, Gramercy Books 1996, p. 612.</p>
“a user identification”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<p><u>Intrinsic</u>: ’011 patent at 2:5-8; 4:32-42; 7:50-60; FIG. 4 (and related text); FIG. 6 (and related text)</p> <p><u>Extrinsic</u>: “identification” – Webster’s Encyclopedic Unabridged Dictionary of the English Language, Gramercy Books 1996, p. 950.</p> <p>“user identifier, user id” - The New Penguin Dictionary of Computing, Penguin Books 2001, p. 523.</p>

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Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
“respective user identifications”	R2 Solutions contends that this phrase needs no construction and should be afforded its plain and ordinary meaning.	<p><u>Intrinsic</u>: ’011 patent at 2:5-8; 4:32-42; 7:50-60; FIG. 4 (and related text); FIG. 6 (and related text)</p> <p><u>Extrinsic</u>: “identification” – Webster’s Encyclopedic Unabridged Dictionary of the English Language, Gramercy Books 1996, p. 950.</p> <p>“user identifier, user id” - The New Penguin Dictionary of Computing, Penguin Books 2001, p. 523.</p> <p>“respective” - Webster’s Encyclopedic Unabridged Dictionary of the English Language, Gramercy Books 1996, p. 1640.</p>
“user-institution authentication data”	“authentication data needed by the user to access the financial institution's services”	<p><u>Intrinsic</u>: ’011 patent at 2:5-14; 2:40-46; 2:52-55; 4:56-63; 5:44-62; 08/20/2007 Notice of Allowability at 3-6; 04/30/2007 Amendment at 7-11</p>
“associating the user identification with the portal”	“associating the user identification with the service that stands between the user and another service to perform an added value”	<p><u>Intrinsic</u>: ’011 patent at 4:29-32</p> <p><u>Extrinsic</u>: “associate” – Webster’s Encyclopedic Unabridged Dictionary of the English Language, Gramercy Books 1996, p. 126.</p> <p>“identification” – Webster’s Encyclopedic Unabridged Dictionary of the English Language, Gramercy Books 1996, p. 950.</p>

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Disputed Term/Phrase	Plaintiff’s Proposed Construction	Plaintiff’s Support
		<p>“user identifier, user id” - The New Penguin Dictionary of Computing, Penguin Books 2001, p. 523.</p>
<p>“associating respective user identifications with the portal”</p>	<p>“associating respective user identifications with the service that stands between the user and another service to perform an added value”</p>	<p><u>Intrinsic</u>: ’011 patent at 4:29-32</p> <p><u>Extrinsic</u>: “associate” – Webster’s Encyclopedic Unabridged Dictionary of the English Language, Gramercy Books 1996, p. 126.</p> <p>“respective” - Webster’s Encyclopedic Unabridged Dictionary of the English Language, Gramercy Books 1996, p. 1640.</p> <p>“identification” – Webster’s Encyclopedic Unabridged Dictionary of the English Language, Gramercy Books 1996, p. 950.</p> <p>“user identifier, user id” - The New Penguin Dictionary of Computing, Penguin Books 2001, p. 523.</p>